

# Federal Defenders OF NEW YORK, INC.

Southern District  
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April 28, 2021


**BY EMAIL**

Honorable Lewis J. Lima  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**REQUEST GRANTED.**

Defendant's bail conditions to be modified as  
proposed with placement on home detention.

4/29/2021 SO ORDERED.

  
LEWIS J. LIMAN  
United States District Judge

**Re: United States v. Jesus Alberto Brito Maldonado**  
**21 CR. 167 (LJL)**

Dear Judge Liman,

With the consent of the Government and Pretrial, I respectfully write on behalf of my client, Jesus Brito, to request that he be placed on home detention so that he can obtain employment. Mr. Brito already has one offer of employment with the New York Twins Baseball League as a trainer and coach. *See* Letter from Alexander Oates with New York Twins Baseball. This employment is not stationary because games and training sessions take place at different baseball fields in the area. Therefore, as a matter of policy, the employment would not be approved by Pretrial Services unless the Court ordered that Mr. Brito be allowed to work with New York Twins.

On 2/12/2021, the following bail conditions were set for Mr. Brito by Judge Gorenstein: \$50,000 PRB; 3 FRP'S; Travel Limited to SDNY/EDNY; Surrender Travel Documents (family must turn in his US and Dominican Passport); Pretrial Supervision As Directed by PTS; Deft to Submit to Urinalysis, If Positive, Add Condition of Drug Testing/Treatment; Home Incarceration; Electronic Monitoring; Deft Not to Possess Firearm/Destructive Device/Other Weapon. His conditions were modified shortly after his release to allow him to go to the hospital for the birth of his first child. Mr. Brito has been fully compliant with his conditions of release.

I request that Mr. Brito be placed on home detention which will allow him to work outside of the home. As mentioned above, the Government and Pretrial consent to this request. I also ask the Court to order that Mr. Brito be permitted to work with the New York Twins Baseball League as one form of employment.

Respectfully submitted,  
/s/\_\_\_\_\_  
Zawadi Baharanyi  
Assistant Federal Defender  
917-612-2753

cc: Jonathan Bodansky (Email).

To whom it may concern:

Honorary Judge

26th of March 2021

Character reference letter

Your Honor,

I am writing this letter to refer Jesus Brito in regards to his character and employemt.

I would like to introduce myself as Alexander M Oates , working in the position of owner of New York Twins Baseball.

I have worked with Jesus for 3 years; he serves as the pitching coach while still being the ace and anchor of the pitching staff . Mr.Brito assists me with the pitching staff while we are playing double headers of baseball on the weekends . We are part of the New Jersey Amteur Baseball Legue. We will be having events starting march 21. We are usually out on the field as early as 9:00 am and as late as 6:00 pm. I compensate Mr. Brito at \$35 and hours in cash. When not playing or coaching Mr. brito gives private practices with me at NY Sluggers academy located in 728 E 136th st Bronx NY 10454 Mr

He is a very hard working person and everyone in the organization has immense respect for him. He is able to connect with kids and as well as adults in the baseball arena.  
He is a cheerful and a very helpful person. He also runs our pitching camps where he earns his financial stipends but most importantly he is changing lives for the youth.  
He has done events for the organization for free and he has done events where he has earned a decent pay day. Nevertheless , he is always willing to teach and give his time.

If he was given the ability to still earn a living for a few hours I am sure he will do the right for himself, his family, this organization while still living by the strict rules placed in front of him today.

Please take this letter into consideration and I thank you for your time.

Warm Regards

New York Twins Organization

Alexander M Oates

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Thiells, New York 10984

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917-732-3426